

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

INDECK KEYSTONE
ENERGY, LLC, a Delaware limited liability
company,

Plaintiff,

v.

VICTORY ENERGY
OPERATIONS, LLC, a Delaware limited
liability company,

Defendant.

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: CIVIL ACTION
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: NO. 04-CV-325 (ERIE)
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: Judge Sean J. McLaughlin
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DISCOVERY DISPUTE CERTIFICATE

Undersigned Counsel hereby certifies that he has made good faith efforts to confer with opposing counsel and resolve the outstanding discovery disputes, but has been unable to reach a resolution. The efforts are outlined in detail in the attached Motion, but include numerous communications by phone and email and numerous offers at compromising the parties' respective positions.

Respectfully submitted,

/s/ Robert J. Williams

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